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October 13, 2020

Via ECF:

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Valle, et. al.*,
Case No. 1:13-cr-00058 (AKH)

Dear Judge Hellerstein:

This office represents Defendant Jancey Valle ("Mr. Valle") in the above-referenced matter. We respectfully move to modify conditions of Mr. Valle's release, to allow him to leave his residence to participate in a re-entry program, do exercise, laundry and grocery shopping.

By Order dated July 23, 2020, this Court granted Mr. Valle's compassionate release "subject to home confinement" with "the ability to leave home for employment or to seek employment." (Doc. No. 753 at ¶ 1.)

Mr. Valle desires to leave his residence to participate in programs offered by the New Jersey ReEntry Corporation, an organization that helps convicts remove barriers to employment and reintegrate into society.

Mr. Valle also desires to leave his residence to take care of his health. As part of Mr. Valle's motion for compassionate release, we demonstrated that he suffers from Hypercholesterolemia (high cholesterol) and Obesity. It is, thus, extremely important for him to exercise.

Mr. Valle also desires to do his own laundry and shop for food and necessities, so that he is not dependent on others.

I conferred with Probation Officer Afonso Fernandes who advised me that under the Court's current Order (Doc. No. 753) Probation and Pretrial Services may not grant Mr. Valle permission to leave his residence for the purposes listed above.

So Ordered
10-15-20
Alvin K. Hellerstein

Hon. Alvin K. Hellerstein
October 13, 2020
Page 2

We, therefore, respectfully ask the Court to grant Probation and Pretrial Services permission to allow Mr. Valle to leave his residence:

- 1) to participate in New Jersey ReEntry Corporation programs;
- 2) to go to the gym or park for purposes of exercising;
- 3) to go to the laundry for purposes of washing his cloths; and
- 4) to go to the grocery or supermarket for purpose of shopping food and necessities.

Notwithstanding the foregoing, Mr. Valle must notify his probation officer of the location of the New Jersey ReEntry Corporation he seeks permission to go to, the date and time of each visit, and his probation officer must approve each request prior to Mr. Valle leaves his residence. Additionally, Mr. Valle's probation officer must approve the gym, park, laundry and grocery or supermarket, and the times when Mr. Valle may go there, either each time prior to Mr. Valle leaves his residence or his probation officer may set a schedule for Mr. Valle to adhere to.

I conferred with Probation Officer Afonso Fernandes and Assistant United States Attorney Sarah L. Kushner, they do not object to the foregoing requests.

Respectfully submitted,

/s/ Leopold Gross

cc: Sarah L. Kushner, U.S. Attorney's Office (via ECF)
Afonso Fernandes, Probation Officer (via email)